



Marilyn C. Hoyt
President & CEO

June 12, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Chinese Language TV programming for New York City

Dear Ms. Dortch:

I am writing to support Multicultural Television Broadcasting, LLC (MTBL)'s effort to provide Chinese language television programming to the residents of New York City on WSAH(TV).

As President and CEO of the New York Hall of Science, I can speak to the importance of MTBL's work in our community. The Hall is New York City's hands-on science and technology center, serving more than 425,000 students, teachers, and families each year. A significant portion of that audience includes immigrant families and first-generation American children. In fact, more than 104 languages are spoken within a five-mile radius of the Hall. Anything that can be done to provide easily accessible services to these groups is an important aspect of our community's vitality.

Furthermore, New York City is home to the largest Chinese American population in the United States. According to the U.S. Census, there are approximately 374,000 Chinese Americans living in New York City, although the actual population is believed to be significantly higher. In 1990, Chinese Americans accounted for 38% of the population of Queens, 34% of the population of Brooklyn and 24% of the population of Manhattan. More than 60% of the Chinese living in New York City have limited proficiency in English, including 65% of Chinese working-age adults, and 85% of Chinese American senior citizens.

Unfortunately, the level of dedicated Chinese language programming in New York City is not adequate to serve the needs of the city's growing Chinese population. Currently, free, over-the-air Chinese language programming in New York City is confined to a single, isolated one-hour block of time from 11:00pm to 12:00 midnight on WMBC-TV. Although additional Chinese language programming is available on certain cable and satellite channels, access to these programming are extremely limited due to lower cable and satellite television penetration rates within the Chinese community and the premium package charges associated with those program tiers.

MTBL's proposal would provide the growing but otherwise isolated Chinese American community in New York City with invaluable free, over-the-air local news and public affairs programming, emergency information and alerts, community bulletins, and public service announcements in their native language.



Because of the urgent need for this broadcast service in New York City, the New York Hall of Science supports MTBL's efforts and encourages the Federal Communications Commission to grant WSAH(TV)'s application as expeditiously as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Hoyt", written over the word "Sincerely,".

Marilyn Hoyt

cc:

U.S. Senator Charles E. Schumer
Congresswoman Nydia M. Velázquez
City Council Speaker, Christine C. Quinn
City Council Member, John C. Liu
NY State Assembly Member, Ellen Young
Fred Teng, Sino Television, Inc.

美國華商會

U.S. CHINESE CHAMBER OF COMMERCE

July 24, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th street, SW
Washington, DC 20554

Re: Chinese Language TV programming for New York City

Dear Ms. Dortch:

I am writing this letter to express U.S. Chinese Chamber of Commerce's support for Multicultural Television Broadcasting, LLC (MTBL)'s effort to provide Chinese language television programming to the resident of New York City on WSAH(TV).

U.S. CHINESE CHAMBER OF COMMERCE

Founded by a group of Chinese American entrepreneurs and leaders of well-known Chinese business associations across United States, U.S. Chinese Chamber of Commerce has unified many Chinese American business elite.

The mission of U.S. Chinese Chamber of Commerce is to unite all Chinese American businesses, to protect their rights and benefits, to promote worldwide Chinese economic cooperation, to assist members to enter mainstream American business and economy, and to promote international business exchange and cooperation especially between US and China.

U.S. Chinese Chamber of Commerce will strengthen itself through unity, develop itself through service, monitor and participate in activities to influence local, state, and national legislations. It will utilize diligence, wisdom and global network of Chinese businesses to develop Chinese business community and economic globalization.

New York City is home to the largest Chinese American population in the United States. According to the U.S. Census, there are approximately 374,000 Chinese Americans living in New York City, although the actual population is believed to be significantly higher. In 1990, Chinese Americans accounted for 38% of the population of Queens, 34% of the population of Brooklyn and 24% of the population of Manhattan. More than 60% of the Chinese living in New York City have limited proficiency in English, including 65% of Chinese working-age adults, and 85% of Chinese American senior citizens.

135 West 36th Street, New York, NY 10018

Tel.: 212-967-8377 Fax: 212-967-8018 Email: info@usccc.mailme.org Website: www.usccc.uni.cc

美國華商會

U.S. CHINESE CHAMBER OF COMMERCE

Unfortunately, the level of dedicated Chinese language programming in New York City is not adequate to serve the needs of the city's growing Chinese population. Currently, free, over-the-air Chinese language programming in New York City is confined to a single, isolated one-hour block of time from 11:00pm to 12:00 midnight on WMBC-TV. Although additional Chinese language programming is available on certain cable and satellite channels, access to these programming are extremely limited due to lower cable and satellite television penetration rates within the Chinese community and the premium package charges associated with those program tiers.

MTBL's proposal would provide the growing but otherwise isolated Chinese American community in New York City with invaluable free, over-the-air local news and public affairs programming, emergency information and alerts, community bulletins, and public service announcements in their native language.

Because of the urgent need for this broadcast service in New York City, US Chinese Chamber of Commerce enthusiastically supports MTBL's efforts and encourages the Federal Communications Commission to grant WSAH(TV)'s application as expeditiously as possible.

Sincerely,

Howard H. Li
Chairman

CC:

U.S. Senator Charles E. Schumer

757 Third Avenue, Suite 1702, New York, NY 10017

Congresswoman Nydia M. Velázquez

173 Avenue B, New York, NY 10009

City Council Speaker, Christine C. Quinn

City Hall, New York, NY 10007

City Council Member, John C. Liu

250 Broadway, 18th Floor, New York, NY 10007

NY State Assembly Member, Ellen Young

39-07 Prince Street, Suite 5D, Flushing, NY 11354

Fred Teng, Sino Television, Inc.

449 Broadway, New York, NY 10013 and via fax 212-966-9580

135 West 36th Street, New York, NY 10018

Tel.: 212-967-8377 Fax: 212-967-8018 Email: info@usccc.mailme.org Website: www.usccc.uni.cc

華人策劃協會



CHINESE-AMERICAN PLANNING COUNCIL INC.

150 Elizabeth Street, New York, N.Y. 10012
Tel: 212-941-0920 Fax: 212-966-8581

A not-for-profit, multi-social service educational and planning agency.

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Eddie Mo, 1st Vice Chair
Pearl Tam, Vice Chair
Veronica Tsang, 1st Vice President
Pauline Tse, Vice President
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EXECUTIVE DIRECTOR

David S. Chen

DAY CARE CENTERS

Baxter St.	431-8574	First Ave.	533-2670
Chrystie St.	431-9124	Little Star	673-2680
Confucius	925-4325	Pike St.	587-0912
Essex St.	254-0460		

Chinese Cultural Program	925-4325
Chung Pak Day Care	343-9830
Garment Industry Day Care	219-2286
Jacob Rits Day Care	533-9138
Queens Day Care	718-358-8899

FOOD SERVICE

673-9509

WORKFORCE DEVELOPMENT DIVISION

Apparel Careers Training	941-0041
BASICS	914-0041
CAMER Administration	941-0041
Clerical Careers	941-0041
Hotel Service Careers	718-358-8899
	718-851-8870
Mature Workers	718-358-8899

MULTI-SOCIAL SERVICE

HIV/AIDS Services	646-613-8369
Asian Family Services	941-0030
Brooklyn/Sunset Park	718-492-0409
Manhattan Multi-Social Center	431-7800
Queens Branch	718-358-8899
Services to Asian Parents of the Disabled	718-358-8899

SENIOR CITIZENS

Chinatown Senior Citizen Center	233-8930
CPC Home Attendant	219-8100
Project Open Door	431-9026
Nan Shan Senior Center	718-358-3030
Senior Aides	718-358-8899

YOUTH

Manhattan Youth Services	941-0920
Brooklyn Youth Services	718-492-0409
Queens Youth Services	718-358-8899
Project Reach	966-4227
Youth Employment Program	334-0082
Asian American Housing Mgmt Corp	475-7730
Chinese-American Arts Council (CAAC)	431-9740
Chinese-American Local Development Corp	941-0920

Chinese-American Planning Council Inc.
Confucius Plaza Day Care Center
40 Division Street Room 131
New York, N.Y. 10002

July 25, 2007.

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th street, SW
Washington, DC 20554

Re: Chinese Language TV programming for New York City

Dear Ms. Dortch:

I am writing this letter to express CPC-Confucius Plaza Day Care Center support for Multicultural Television Broadcasting, LLC (MTBL)'s effort to provide Chinese language television programming to the resident of New York City on WSAH(TV).

The Chinese American Planning Council Inc. Confucius Plaza SADCC 124 program at Public School 124M will serve elementary school children whose ages six to eleven years old, grades one to five, sponsors the CPC Confucius Plaza School-Age Day Care Center. Over 95% of the children live in Chinatown and attend P.S. 124M (Region 9). Confucius Plaza SADCC 124 in my community is to have a multi-lingual and multi-cultural curriculum that aims to develop the child Intellectually, socially, and physically. The daycare serves the children in contributing to their over-all development through our tutoring, multicultural, recreational, artistic, and community service programs, while simultaneously serving the parents by providing care of their children while they work, and to provider assistance in their children educational and development.

New York City is home to the largest Chinese American population in the United States. According to the U.S. Census, there are approximately 374,000 Chinese Americans living in New York City, although the actual population is believed to be significantly higher. In 1990, Chinese Americans accounted for 38% of the population of Queens, 34% of the population of Brooklyn and 24% of the population of Manhattan. More than 60% of the Chinese living in New York City have limited proficiency in English, including 65% of Chinese working-age adults, and 85% of Chinese American senior citizens.

Unfortunately, the level of dedicated Chinese language programming in New York City is not adequate to serve the needs of the city's growing Chinese population. Currently, free, over-the-air Chinese language programming in New York City is confined to a single, isolated one-hour block of time from 11:00pm to 12:00 midnight on WMBC-TV. Although additional Chinese language programming is available on certain cable and satellite channels, access to these programming are extremely limited due to lower cable and satellite television penetration rates within the Chinese community and the premium package charges associated with those program tiers.

華人策劃協會



CHINESE-AMERICAN PLANNING COUNCIL INC.

150 Elizabeth Street, New York, N.Y. 10012
Tel: 212-941-0920 Fax: 212-966-8581

A not-for-profit, multi-social service educational and planning agency.

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Donald Hong	

EXECUTIVE DIRECTOR

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Queens Day Care	718-358-8899

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WORKFORCE DEVELOPMENT DIVISION

Apparel Careers Training	941-0041
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CAMER Administration	941-0041
Clerical Careers	941-0041
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Queens Branch	718-358-8899
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CPC Home Attendant	219-8100
Project Open Door	431-9026
Nan Shan Senior Center	718-358-3030
Senior Aides	718-358-8899

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Manhattan Youth Services	941-0920
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Queens Youth Services	718-358-8899
Project Reach	966-4227
Youth Employment Program	334-0082

Asian American Housing Mgmt Corp	475-7730
Chinese-American Arts Council (CAAC)	431-9740
Chinese-American Local Development Corp.	941-0920

MTBL's proposal would provide the growing but otherwise isolated Chinese American community in New York City with invaluable free, over-the-air local news and public affairs programming, emergency information and alerts, community bulletins, and public service announcements in their native language.

Because of the urgent need for this broadcast service in New York City, CPC-Confucius Plaza Day Care Center enthusiastically supports MTBL's efforts and encourages the Federal Communications Commission to grant WSAH(TV)'s application as expeditiously as possible.

Sincerely,

Pauline Chen

Director of CPC-Confucius Plaza Day Care Center

CC:

U.S. Senator Charles E. Schumer

757 Third Avenue, Suite 1702, New York, NY 10017

Congresswoman Nydia M. Velázquez

173 Avenue B, New York, NY 10009

City Council Speaker, Christine C. Quinn

City Hall, New York, NY 10007

City Council Member, John C. Liu

250 Broadway, 18th Floor, New York, NY 10007

NY State Assembly Member, Ellen Young

39-07 Prince Street, Suite 5D, Flushing, NY 11354

Fred Teng, Sino Television, Inc.

449 Broadway, New York, NY 10013 and via fax 212-966-9580

華人策劃協會



**CHINESE-AMERICAN
PLANNING COUNCIL INC.**

A Not-For-Profit Multi-Social
Service, Educational, and
Planning Agency

Chair: Wayne Wong
President: Donald Hong

EXECUTIVE DIRECTOR:
David S. Chen

QUEENS BRANCH
136-26 37 Avenue, 3rd Fl.
Flushing, NY 11354

Tel: (718) 358-8899
Fax: (718) 762-6872

BRANCH DIRECTOR:
Dominic Yip

SERVICE PROGRAMS:

Hotel Training Program:
1. Day Program (DOE)
2. Evening Program
(Fee Paying)

Service To Asian Parents Of
The Disabled Program:
1. Family Support Services
2. Caregiver Assistance
3. Youth Leadership Training
4. Youth Counseling Services
5. IRA Program

Youth Program:
1. Intergenerational Program
2. After School Program
3. Summer Day Camp

P.S. 20 School Age Day Care
142-30 Barclay Avenue
Flushing, NY 11355
(718) 358-8899 10:30am - 2:30pm
(718) 358-7802 3:00pm - 6:00pm

Queens Nan-Shan Senior Center
133-12 41 Avenue
Flushing, NY 11355
Tel: (718) 358-3030
Fax: (718) 358-3558

07/25/07

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Chinese Language TV programming for New York City

Dear Ms. Dortch:

I am writing this letter to express CPC Nan Shan Senior Center's support for Multicultural Television Broadcasting, LLC (MTBL)'s effort to provide Chinese language television programming to the resident of New York City on WSAH(TV).

It has been 19 years since the official founding of the Queens Nan-Shan Senior Center of the Chinese-American Planning Council in November 1988. Since then its membership has grown over 10,100 by January 2007, and increase of 20 times in 19 years. QNSC's active membership constantly maintain in the 6,000 level. Services include congregate meals, homeland meals, case assistance, entitlement applications, ESL and naturalization classes, and other recreational and educational activities, such Chinese calligraphy and painting, Tai-Chi classes, ethnic and social dances, videos, trips, and health activities.

New York City is home to the largest Chinese American population in the United States. According the the U.S. Census, there are approximately 374,000 Chinese Americans living in the New York City, although the actual is believed to



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Service, Educational, and
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President: Donald Hong

EXECUTIVE DIRECTOR:
David S. Chen

QUEENS BRANCH
136-26 37 Avenue, 3rd Fl.
Flushing, NY 11354

Tel: (718) 358-8899
Fax: (718) 762-6672

BRANCH DIRECTOR:
Dominic Yip

SERVICE PROGRAMS:

Hotel Training Program:

1. Day Program (DOE)
2. Evening Program
(Fee Paying)

Service To Asian Parents Of
The Disabled Program:

1. Family Support Services
2. Caregiver Assistance
3. Youth Leadership Training
4. Youth Counseling Services
5. IRA Program

Youth Program:

1. Intergenerational Program
2. After School Program
3. Summer Day Camp

P.S. 20 School Age Day Care

142-30 Barclay Avenue
Flushing, NY 11355
(718) 358-8899 10:30am - 2:30pm
(718) 358-7602 3:00pm - 6:00pm

Queens Nan-Shan Senior Center

133-12 41 Avenue
Flushing, NY 11355
Tel: (718) 358-3030
Fax: (718) 358-3558

be significantly higher. In 1990, Chinese Americans accounted for 38% of the population of Queens, 34% of the population of Brooklyn and 24% of the population of Manhattan. More than 60% of the Chinese living in New York City have limited proficiency in English, including 65% of Chinese working-age adults, and 85% of Chinese American senior citizens.

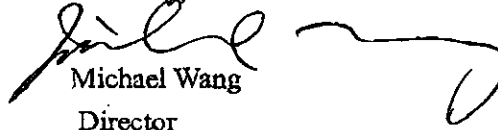
Unfortunately, the level of dedicated Chinese language programming in New York City is not adequate to serve the needs of the city's growing Chinese population. Currently, free, over-the-air Chinese Language programming in New York City is confined to a single, isolated one-hour block of the form 11:00pm to 12:00 midnight on WMBC-TV.

Although additional Chinese language programming is available on certain cable and satellite channels, access to these programming are extremely limited due to lower cable and satellite television penetration rates within the Chinese community and the premium package charges associated with those programs tiers.

MTBL's proposal would provide the growing but otherwise isolated Chinese American community in New York City with invaluable free, over-the-air local news and public affairs programming, emergency information and alerts, community bulletins and public service announcements in their native language.

Because of the urgent need for the broadcast service in New York City, CPC Nan Shan Senior Center's enthusiastically supports MTBL's efforts and encourages the Federal Communications Commission to Grant WSAH(TV)'s application as expeditiously as possible.

Sincerely,



Michael Wang
Director



Chinatown Partnership Local Development Corporation 華埠共同發展機構

Friday, June 13th, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th street, SW
Washington, DC 20554

Re: Chinese Language TV programming for New York City

Dear Ms. Dortch:

I am writing this letter to express Chinatown Partnership's support for Multicultural Television Broadcasting, LLC (MTBL)'s effort to provide Chinese language television programming to the resident of New York City on WSAH(TV).

The Chinatown Partnership is community based non-profit 501 (c) (3) organizations which was created after 9/11 specifically to counter the impacts on the Chinatown community.


New York City is home to the largest Chinese American population in the United States. According to the U.S. Census, there are approximately 374,000 Chinese Americans living in New York City, although the actual population is believed to be significantly higher. In 1990, Chinese Americans accounted for 38% of the population of Queens, 34% of the population of Brooklyn and 24% of the population of Manhattan. More than 60% of the Chinese living in New York City have limited proficiency in English, including 65% of Chinese working-age adults, and 85% of Chinese American senior citizens.

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MTBL's proposal would provide the growing but otherwise isolated Chinese American community in New York City with invaluable free, over-the-air local news and public affairs programming, emergency information and alerts, community bulletins, and public service announcements in their native language.

Because of the urgent need for this broadcast service in New York City, [insert organization name] enthusiastically supports MTBL's efforts and encourages the Federal Communications Commission to grant WSAH(TV)'s application as expeditiously as possible.

Sincerely,



Wellington Z. Chen
Executive Director

CC:

U.S. Senator Charles E. Schumer

757 Third Avenue, Suite 1702, New York, NY 10017

Congresswoman Nydia M. Velázquez

173 Avenue B, New York, NY 10009

City Council Speaker, Christine C. Quinn

City Hall, New York, NY 10007

City Council Member, John C. Liu

250 Broadway, 18th Floor, New York, NY 10007

NY State Assembly Member, Ellen Young

39-07 Prince Street, Suite 5D, Flushing, NY 11354

Fred Teng, Sino Television, Inc.

449 Broadway, New York, NY 10013 and via fax 212-966-9580



Chinese American Culture & Art Association
中美文化藝術促進會

July 25, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Chinese Language TV programming for New York City

Dear Ms. Dortch:

I am writing on behalf of Chinese American Culture and Art Association (CACAA) to express our support for Multicultural Television Broadcasting, LLC (MTBL)'s effort to provide Chinese language television programming to the resident of New York City on WSAH(TV).

CACAA was first founded in 1997 as a non-profit community based organization to promote art & culture exchange between US and China and to show case emerging Chinese American artists in the community. Our banner programs include lunar New Year celebration in the Borough of the Bronx and the Festival of Chinese Operas, just to name a couple.

New York City is home to the largest Chinese American population in the United States. According to the U.S. Census, there are approximately 374,000 Chinese Americans living in New York City, although the actual population is believed to be significantly higher. Based on the latest statistics, Chinese Americans accounted for 38% of the population of Queens, 34% of the population of Brooklyn and 24% of the population of Manhattan. More than 60% of the Chinese living in New York City have limited proficiency in English, including 65% of Chinese working-age adults, and 85% of Chinese American senior citizens.

Unfortunately, the level of dedicated Chinese language programming in New York City is far from adequate to serve the needs of the city's growing Chinese population. Currently, free, over-the-air Chinese language programming in New York City is confined to a single, isolated one-hour block of time from 11:00 pm to 12:00 midnight on WMBC-TV. Although additional Chinese language programming is available on certain cable and satellite channels, access to these programming are extremely limited due to lower cable and satellite television penetration rates within the Chinese community and the premium package charges associated with those program tiers.

MTBL's proposal would provide the growing but otherwise isolated Chinese American community in New York City with invaluable free, over-the-air local news and public affairs programming, emergency information and alerts, community bulletins, and public service announcements in their native language.

401 Broadway, Suite 2001, New York, NY 10013
Tel: 212-750-5295 • Fax: 212-750-5364
Email: cacaany@yahoo.com



Because of the urgent need for this type of broadcast service in New York City, CACAA enthusiastically supports MTBL's efforts and encourages the Federal Communications Commission to grant WSAH(TV)'s application as expeditiously as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Wang', with a horizontal line extending to the right.

Charles P. Wang
President

cc:

U.S. Senator Charles E. Schumer
Congresswoman Nydia M. Velazquez
City Council Speaker, Christine C. Quinn
City Council Member, John C. Liu
NY State Assembly Member, Ellen Young
Fred Teng, Sino Televisions, Inc.

Attachment 3 to Petition for Rule Making

Engineering Statement
Kevin T. Fisher
Smith and Fisher

ENGINEERING STATEMENT

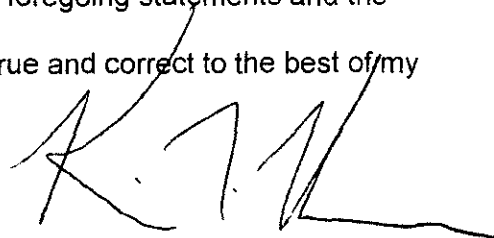
The engineering data contained herein have been prepared on behalf of MTB BRIDGEPORT-NY LICENSEE LLC, licensee of WSAH-DT, Channel 42 in Bridgeport, Connecticut, in support of its Petition for Rulemaking to substitute Channel 41 for Channel 42 in the Commission's Digital Table of Allotments for this station. In addition, the Petitioner proposes to move the station's transmitting site to the Empire State Building and operate with a directional antenna and an effective radiated power of 990 kw. The purpose of this exhibit is to provide service contour population and area values as well as those values for gain and loss areas created by the station's move and new operating parameters.

Figure 1 is a map upon which we have plotted the 41 dBu service contours of WSAH-DT as allotted in Appendix B of the Commission's Digital Television Table of Allotments and as proposed from the Empire State Building on Channel 41. As shown, there are sizeable gain and loss areas generated by the station's proposed move and channel change. On this map, the area and population numbers are provided for the pertinent WSAH-DT service contours as well as for the gain and loss areas. It is important to note that the areas were computed using software algorithms and the population numbers within the service contours are based on 2000 U.S. Census data (as opposed to the Longley-Rice-based service population numbers provided in the Commission's table in Appendix B of the DTV Table of Allotments).

Figure 2 is the same map, however, we have added the 36 dBu service contour of WTNH-DT, Channel 10 in New Haven, Connecticut, with which the owner of WSAH-DT has an agreement to lease channel space. The combined WSAH-DT/WTNH-DT service area and population numbers are provided on the map, as well as revised gain and loss area values.

As shown, with the addition of the WTNH-DT service contour, there is no loss area generated by the move of WSAH-DT to the Empire State Building on Channel 41 with the facilities described in the engineering portion of the Petition for Rulemaking.

I declare, under penalty of perjury, that the foregoing statements and the attached maps, which were prepared by me, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a long horizontal stroke extending to the right.

KEVIN T. FISHER

June 20, 2008

FIGURE 1

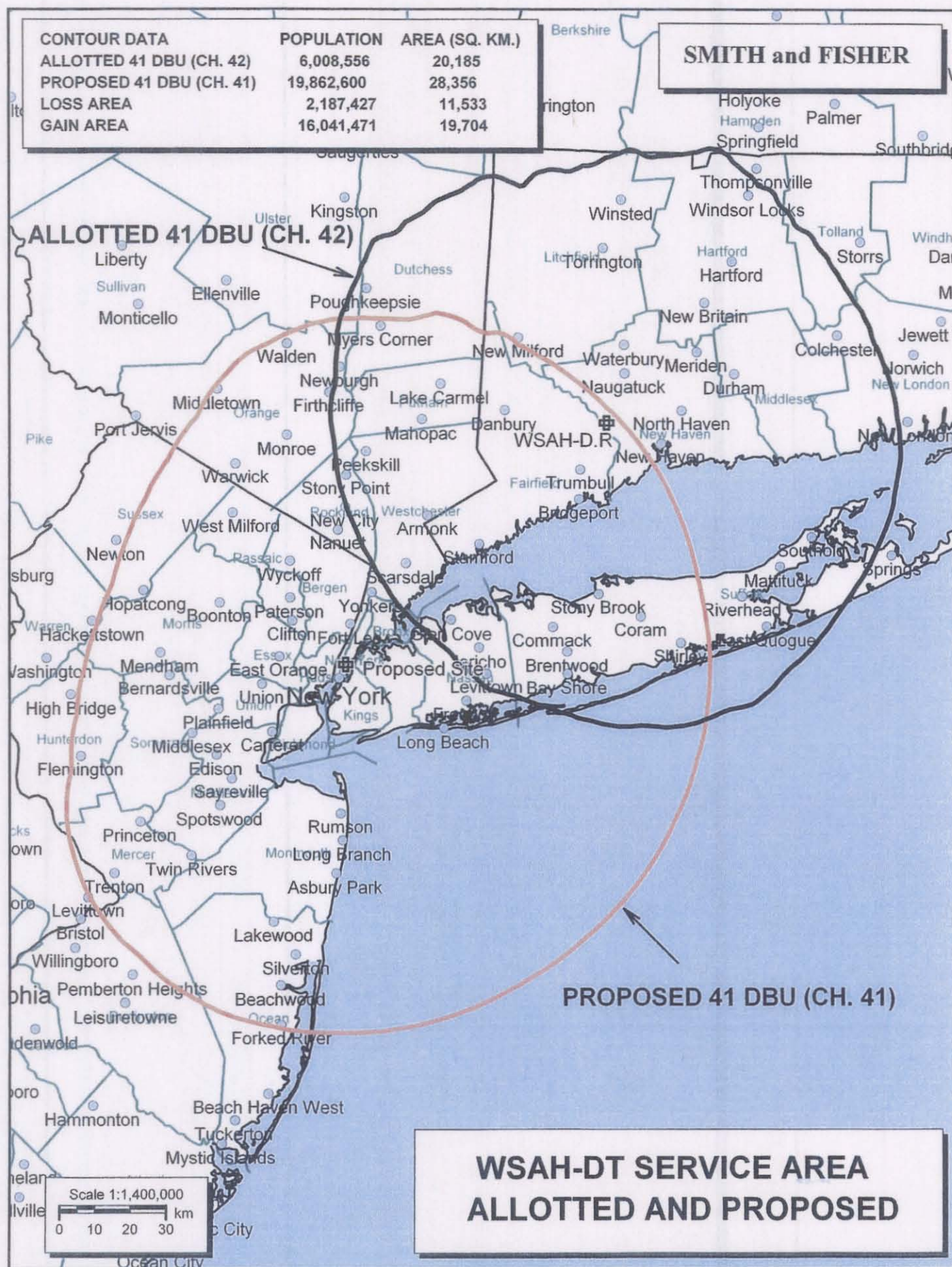
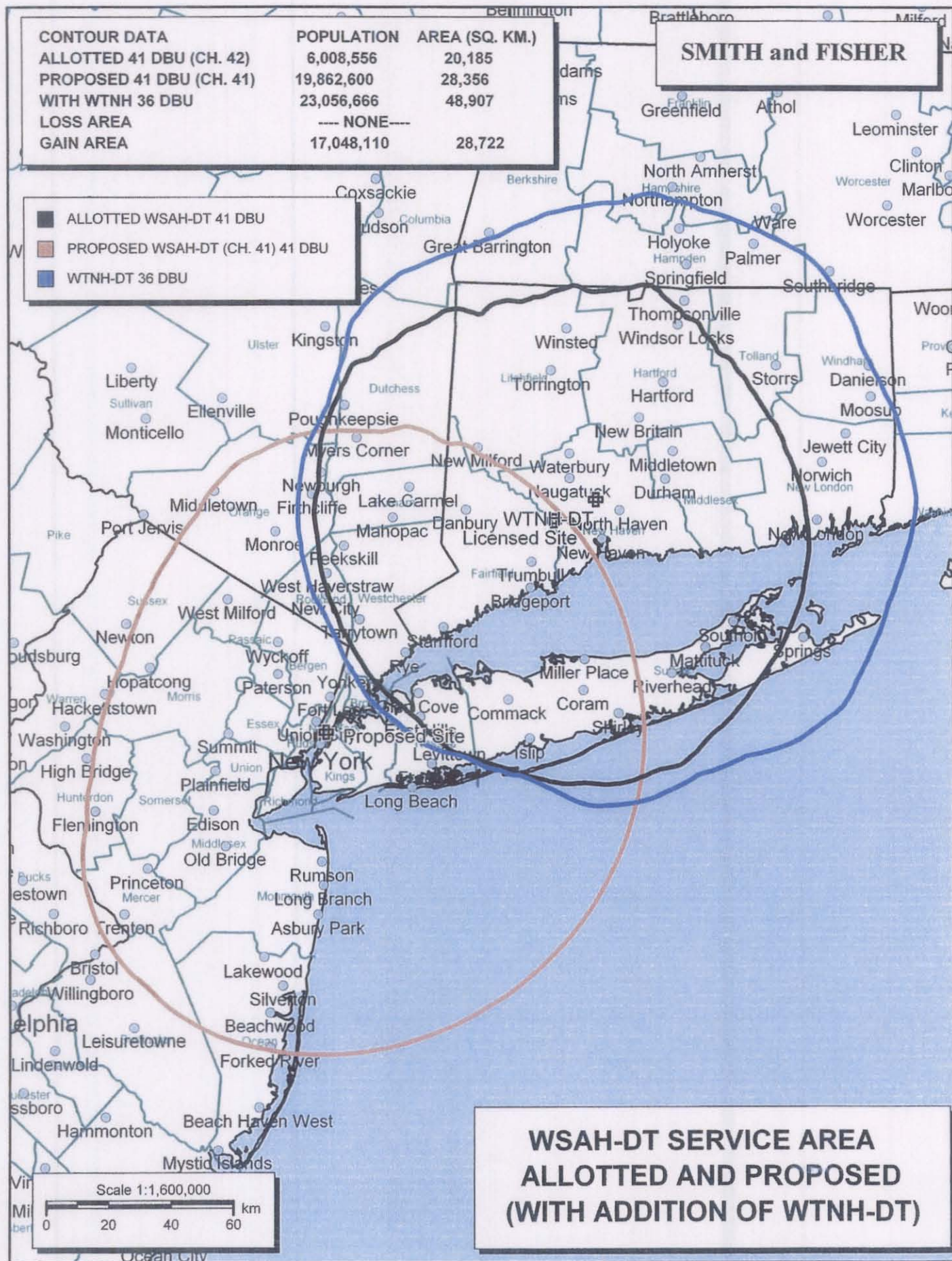


FIGURE 2



Attachment 4 to Petition for Rule Making

Technical Statement
S. Merrill Weiss
Merrill Weiss Group LLC

**Technical Statement for
MTB Bridgeport-NY Licensee LLC
Petition for Rulemaking:
WSAH-DT
Channel 41
Bridgeport, CT
License in File No. BLCDT-20061218ACB**

Introduction

This Technical Statement provides the supplemental technical data and information required to support a Petition for Rulemaking ("Petition") by MTB Bridgeport-NY Licensee LLC ("MTB") seeking to change the channel and to make other changes to its digital television facility at Bridgeport, CT. MTB seeks a modification of the DTV Table of Allotments for the facility of its digital television station, Station WSAH-DT, currently on Channel 42, to enable it better to maximize that facility. The licensed WSAH-DT facility is in File Number BLCDT-20061218ACB. In addition to changing the channel, the petition seeks to move the location, to change the antenna pattern, and to increase the height and power of the WSAH-DT facility.

The requested channel change is made possible by a change in the Table of Allotments for another station in the same market, allowing it to move to a different channel at the time of the DTV transition. Had it been possible, the channel change now requested in the Petition would have been requested during the FCC's channel election process. Such a request could not be made then, however, because the other station's request to change and the Commission's acceptance of it came so late in the process that there was insufficient time to do the necessary technical evaluations to determine that a change by

WSAH-DT would fit within the context of the Commission's post-transition Table of Allotments.

This Technical Statement includes the data necessary to modify the Table of Allotments and the most recent version of "Appendix B" to cover the proposed operation.

Proposed Table Changes

The changes proposed by the Petition are the substitution of Channel 41 for Channel 42 in the Table of Allotments, a change in the geographic reference point for the station, and increases in height and power for the reference facilities. Besides the channel change, the other proposed modifications to the Appendix B data include relocation of the transmitter to the Empire State Building, an increase in height of the antenna center of radiation from 284.5 m AMSL to 381 m AMSL, an increase in effective radiated power from 780 kW to 990 kW, and a change in the station's antenna pattern from non-directional to directional. The proposed antenna height corresponds to a height above average terrain of 368 meters, as compared to the 168.5 m HAAT of the current facility. Reference specifications for the proposed facility are provided below in Figure 1. The combination of height above average terrain (HAAT) and effective radiated power (ERP) proposed for WSAH-DT falls within the maximum facilities permitted for UHF DTV operations under §73.622(f)(8)(i) of the Commission's rules. Data for updating §73.622(i) Post-Transition Table of DTV Allotments and its associated Appendix B, should the Commission grant the Petition, are included in Figure 2.

A plot of the azimuthal radiation pattern in relative field values is included as Figure 3. The azimuthal power pattern expressed in decibels relative to 1 kW (dBk), is plotted in Figure 4. Figure 5 provides extracts of the tabulated data from which the plots of the field and power patterns were generated. Figure 6 shows the 41.3- and 48-dBu contours (in black and blue, respectively) of the proposed reference facility on a map of the coverage area, using 1-degree-radial contours. (41.3 dBu is the Noise Limited threshold after adjustment for the dipole factor on Channel 41.)

Principal Community Coverage

The currently licensed WSAH-DT facility is located to the northeast of Bridgeport, CT, the city of license – far from the center of the market and DMA of which Bridgeport is part. The proposed relocation of the facility would place the transmitter at a site that is central to the DMA, while continuing to provide principal community coverage over Bridgeport.

As required by Section 73.625(a)(1), the DTV transmitter location must be chosen so as to put a minimum F(50,90) field strength of 48 dBu over the entire principal community to be served. Section 73.625(a)(2) further requires that “the location of the antenna must be so chosen that there is not a major obstruction in the path over the principal community to be served.” As demonstrated by the 48-dBu contour on the coverage map of Figure 6, the transmitter location chosen for the new reference site, combined with the other characteristics of the reference transmission system, would deliver the minimum required field strength over the entire principal community to be served. Furthermore, a shadow study demonstrates that there is not a major obstruction in the path from the proposed new reference point over Bridgeport – the principal community.

Interference to Other Stations

Since the Petition proposes to change the channel of the station and the geographic reference point for the transmitter, to increase the reference power and antenna height of the station, and to change the antenna pattern, interference studies were conducted to determine that adequate protection under these conditions would be provided to all stations within the distances prescribed by the FCC rules. A version of the Commission’s TV_Process program designed to evaluate post-transition interference was used to perform the studies. A summary of the studies is shown in Table 1. In the table, the channel, call sign, city of license, and application record number of each station studied are given in the left four columns. These are followed by the DTV baseline or Class A service contour population in the fifth column, the total population predicted to be impacted by interference with WSAH-DT assumed to be operating with the parameters of its licensed facility, as included in the Table of Allotments (Appendix B), in the sixth

column, and the number of scenarios studied for each station in the seventh column. In the two columns on the right, the populations predicted to be impacted by additional interference with use of the proposed reference facilities are shown alongside the percent changes in population impacted from the current Table of Allotment values. The dashes shown on eight rows indicate instances in which the TV_Process program reported that the “proposal causes no interference,” meaning that there were no cells in its initial culling study that indicated interference. Thus, in these cases, no further examination was required, and the number of scenarios studied was zero. Similarly, there is one row containing plus signs, which indicate that the TV_Process program reported that the “proposed station is beyond the site to nearest cell evaluation distance,” meaning that not even an initial culling study was required. In the remaining cases, in which multiple scenarios existed and TV_Process studied them, the worst-case population impact was selected for presentation in the table.

Table 1 summarizes eighteen cases involving nine stations implicated in the proposed changes to the reference facilities of WSAH-DT and therefore requiring analysis. Eight cases show that nothing beyond the initial culling study was required, while one other case shows that even a culling study analysis was unnecessary. The nine remaining cases required full analysis. Of these, three indicate a reduction of interference from the proposed changes in the reference WSAH-DT facilities, one shows no change resulting from the WSAH-DT proposal, one shows a minuscule amount of predicted new interference, and four show a small amount of predicted new interference – smaller than the limit of 0.5 percent permitted under FCC rules.

From this analysis, it can be concluded that the reference facilities proposed for WSAH-DT in the Petition are predicted to cause no new impermissible interference to any other stations.

Table 1 – WSAH-DT Interference Studies to Neighboring Stations Using FCC TV_Process Program

Chnl	Station	City	ARN	DTV Baseline / Service Pop	Appendix B Interference Population	Scen- arios	CP Mod Interference Population	% Change
38	WPHA-CA	Philadelphia, PA	BLTTA-20041115ACE	+	+	+	+	+
40	WGGB-DT	Springfield, MA	BPCDT-20080317AGW	—	—	—	—	—
40	WGGB-DT	Springfield, MA	DTVPLN-DTVP1438	—	—	—	—	—
40	WXTV-DT	Paterson, NJ	BLCDT-20050214AGS	—	—	—	—	—
40	WXTV-DT	Paterson, NJ	DTVPLN-DTVP1446	—	—	—	—	—
41	WLVI-DT	Cambridge, MA	BLCDT-20070212ABF	6,895,294	17,152	4	29,444	0.1787
41	WLVI-DT	Cambridge, MA	DTVPLN-DTVP1474	6,884,191	13,518	4	25,796	0.1787
41	WUTB-DT	Baltimore, MD	BMPCDT-20051118ADM	6,437,438	440,737	8	441,038	0.0050
41	WUTB-DT	Baltimore, MD	DTVPLN-DTVP1475	6,514,557	316,944	8	316,944	0.0000
41	WPBS-DT	Watertown, NY	BLEDT-20050923AGH	—	—	—	—	—
41	WPBS-DT	Watertown, NY	DTVPLN-DTVP1479	—	—	—	—	—
41	WVIA-DT	Scranton, PA	BLEDT-20010109AAP	1,950,348	40,161	24	49,258	0.4762
41	WVIA-DT	Scranton, PA	DTVPLN-DTVP1482	1,950,348	40,161	24	49,258	0.4762
42	WSKG-DT	Binghamton, NY	BLEDT-20050526ACA	—	—	—	—	—
42	WSKG-DT	Binghamton, NY	DTVPLN-DTVP1511	—	—	—	—	—
42	WTXF-DT	Philadelphia, PA	BLCDT-20070914AAK	7,996,884	559,884	64	496,565	-0.8514
42	WTXF-DT	Philadelphia, PA	DTVPLN-DTVP1514	8,307,867	708,698	32	653,416	-0.7275
42	WTXF-DT	Philadelphia, PA	BPCDT-20080313ACO	8,270,385	668,420	64	593,815	-0.9814

Consideration of Class A Stations

The Commission's Rules specify protection to be afforded by full service DTV stations to analog and digital LPTV stations that have achieved Class A status.¹ For purposes of this investigation, the Commission's TV_Process program was used to locate any Class A stations that might be impacted by the proposed changes to the WSAH-DT facility. The TV_Process program reported only one such station that it located to evaluate. It then found the single Class A station that it examined to be "beyond the site to nearest cell evaluation distance." Thus, there is no interference to Class A stations predicted for the proposed WSAH-DT facility with the changes proposed in the Petition.

Short-Spacing Issue

The question arises whether it is necessary in this Petition for the proposal to meet the geographic spacing requirements of Section 73.623(d) of the Commission's rules. §73.623(d) establishes "minimum geographic spacing requirements for DTV allotments not included in the initial DTV Table of Allotments." §73.616(b) specifies that "a petition to add a new channel to the post-transition DTV Table of Allotments contained in §73.622(i) of this subpart will not be accepted unless it meets: the DTV-to-DTV geographic spacing requirements of §73.623(d) with respect to all existing DTV allotments in the post-transition DTV Table." Since an allotment for WSAH-DT was included in the initial DTV Table of Allotments, the provisions of §73.623(d) must not apply to it, and its Petition instead must be governed by §73.623(c), which defines the "minimum technical criteria for modification of DTV allotments included in the initial DTV Table of Allotments." Under the provisions of §73.623(c), only the prediction of interference protection using the Longley-Rice methodology of OET Bulletin No. 69 (OET-69) is required for changes in facilities, and there are no minimum geographic spacing requirements. It also should be noted that §73.616(b) discusses "a petition to add a **new** channel" to the post-transition DTV table, when invoking the geographic spacing provisions, and requires the use of the OET-69 methods, with updated interference population threshold criteria, when dealing with other situations than new channels.

¹ Section 73.623(c)(5), *Minimum technical criteria for modification of DTV allotments included in the initial DTV Table of Allotments and for applications filed pursuant to this section.*

The MTB Petition is not for a **new** channel, as in the case of a totally new allotment being made, but rather is for assignment of a **substitute** channel for an existing allotment. It is for the **change** of a channel, not for a **new** channel. Except for the time of its occurrence, this is no different than if the channel change sought had been made during the Commission's repacking process, when there would have been no question about this issue. The difference cited here is underscored by the Commission's differentiation in its recent Public Notice lifting the application freeze, in which it permitted petitions from stations to **change** channels but not for the assignment of **additional** or **new** channels where there had been none before. The fact that the current Petition includes requests for the alteration of other parameters of a station's operation at the same time as the request for a change in channels is being made in no way alters the fact that an allotment exists in the city of Bridgeport, CT, and, to improve the technical operations of the station, a request is herein made for the assignment of a different channel. Thus, it is posited that the geographic spacing provisions do not apply with respect to the Petition of MTB for WSAH-DT.

If the preceding discussion is correct, then the following information is immaterial. Nevertheless, in the event that the Commission's interpretation of its rules does not agree with that just elaborated, it is the case that the proposed location for the WSAH-DT transmitter is 30.4 km short of the required spacing of 196.3 km with respect to co-channel station WVIA-DT in Scranton, PA (i.e., the spacing between the two facilities would be 165.9 km). Despite that potential short-spacing, as demonstrated in Table 1, the provisions with respect to interference protection to that station would be fully met by the reference facilities proposed in the Petition and detailed in this document. Consequently, though none is believed to be necessary, should the Commission determine that a waiver of §73.616, §73.623, or any other section of the rules is necessary due to the spacing between the proposed location of the WSAH-DT transmitter and that of WVIA-DT, then such a waiver is respectfully requested.

International Coordination

The proposed new WSAH-DT reference site is within the Canadian coordination zone — 395.7 km distant from the nearest point on the US-Canada border. A Letter of